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2016 AUG 1 PM 12:25

OFFICE OF GENERAL
COUNSEL
July 13, 2016

Donna Rawls, Paralegal
Federal Election Commission
Office of Complaints Examination
And Legal Administration
900 E Street, NW
Washington, DC 20436

RE: **MUR 7091**

Dear Ms. Rawls:

Please be advised that this office represents Morgan Budman, Steven Budman, Ellen Budman, Evan Orchinik and Aileen Orchinik with regard to the above matter. Copies of their Statement of Designation of Counsel are attached.

This action was apparently initiated by an entity entitled Senate Leadership Fund by letter from Steven Law dated June 22, 2016.

The "allegations" in the letter that the contributions by my clients were potentially in some way in violation of campaign finance laws is unsupported by any facts whatsoever. Even the letter from Steven Law does not state that there are any facts to support the allegations except that they believe such donations were "highly suspicious". Such statements without any evidence to support that allegation should not be a basis to require my clients to respond substantively to this baseless charge.

This Complaint by the Senate Leadership Fund contained the personal information related to my client, Morgan Budman, when she was involved in an allegation in 2014 in a case in Montgomery County Pennsylvania. All of the alleged contributions that the Fund alleges were improper were made in 2010 and/or 2011. The inclusion of the Police Reports with the details of this case is nothing more than an attempt to embarrass and humiliate Morgan Budman before her family and friends who have all received this slanderous packet of documents.

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There is no basis to believe that the contributions made by my clients were anything other than the exercise of their right to support candidates that they deemed worthy of their financial support. The actions by the Senate Leadership Fund are reprehensible and disgraceful and should not warrant any further inquiry to my clients.

Very truly yours,



Daniel P. McElhatton

cc: Morgan Budman
Steven Budman
Ellen Budman
Evan Orchinik
Aileen Orchinik

DPM/rlec
Enclosure

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